

A review of the HMR should include more specific information and direction concerning the equipment and devices used by passengers with disabilities. This especially applies to power wheelchairs and the batteries that provide power to these wheelchairs. the HMR language addressing non spillable batteries is not sufficiently specific to be understood by the employees of many airlines. This confusion often results in an undue burden on passengers with disabilities as airlines force us to allow the dismantling of our wheelchairs and the removal and boxing of batteries that are exempt from the HMR. Clear direction should be included in the regulation that wheelchair are not to be disassembled and batteries are not to be removed from wheelchairs when the batteries are clearly identified as non spillable.

Other medical devices such as those used for breathing assistance for those with sleep apnea should be listed as exempt from HMR. Such devices represent no hazard to the aircraft or passengers and are medically necessary for passengers with disabilities with disorders requiring such equipment. Airlines have been know to use the lack of clarity concerning such devices as a means of restricting the carry on items of passengers with disabilities when such restrictions are prohibited under the Air Carrier Access Act. By specifically listing such devices as exempt airlines will not longer be able to violate the ACAA and discriminate against passengers with disabilities in the guise of complying with the HMR.